

**MEMO ENDORSED**

U.S. Department of Justice

*United States Attorney
Southern District of New York**86 Chambers Street
New York, New York 10007*

December 5, 2023

**USDC SDNY
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The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State,*
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act. We write to respectfully request a 45-day extension of the time for the Government to move for summary judgment, from December 7 to January 21, 2024, and extensions of Plaintiffs’ time to file oppositions papers from January 8 to February 20, 2024, and the Government’s time to file its reply papers from January 22 to March 5, 2024.

The reason for this request is that more time is needed to prepare the agency declaration in light of the highly technical nature of the issues presented by a database that will need to be addressed, in addition to upcoming holiday and vacation schedules of the undersigned and at the agency. This is the Government’s second request for an extension of the summary judgment briefing schedule. Plaintiffs consent to the Government’s request.

We thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendant

By: /s/ Joseph A. Pantoja
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cc: Plaintiffs’ counsel (by ECF)

Application GRANTED. The Government's Motion for Summary Judgment must be filed no later than **January 21, 2024**. Plaintiff's opposition must be filed no later than **February 20, 2024**, and the Government's reply is due **March 5, 2024**.

SO ORDERED.

12/5/2023

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE